

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber should be sealed.

On August 27, 2025, Plaintiffs filed an opposition to Uber's motion to enforce the protective order. Plaintiffs' motion refers to and attaches documents that Uber designated "CONFIDENTIAL" or "ATTORNEYS' EYES ONLY" under the stipulated protective order.

Material To Be Filed Under Seal

The material to be filed under seal is portion of Plaintiffs' motion, portions of the declaration in support, and the attached exhibits:

Document	Description	Designating Party
[Unredacted] Plaintiffs' Opposition	Portion of briefing referring to document designated confidential	Uber
[Unredacted] London Declaration	Portion of declaration referring to document designated confidential	Uber
Exhibit B	Exhibit 1731 to Nilles Deposition	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

1 This motion complies with Civil Local Rule 7-11 and 79-5, and the following
2 attachments accompany this motion:

- 3 1. The Declaration of Andrew R. Kaufman in Support of this Motion; and
- 4 2. A Proposed Order that lists in tabular format all material sought to be sealed.

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6 Dated: August 27, 2025

Respectfully submitted,

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24 *Co-Lead Counsel for Plaintiffs*

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: August 27, 2025

By: /s/ Andrew R. Kaufman
Andrew R. Kaufman